UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

THERSIA J. KNAPIK,	
PLAINTIFF	CASE NO. 2:12-cv-175
v.	
MARY HITCHCOCK MEMORIAL HOSPITAL,	
DEFENDANT	

MOTION TO AMEND VERIFIED COMPLAINT AND JURY DEMAND

Pursuant to F.R.C.P. 15(a)(1), plaintiff moves to amend her Verified Complaint and Jury Demand. The purpose of the amendment is to include a jurisdictional statement in the complaint as required by F.R.C.P. 8(a)(1).

Plaintiff filed her Verified Complaint and Jury Demand on August 1, 2012. F.R.C.P. 15(a)(1)(B) provides a party right to amend once as a matter of course within twenty one days after service. The Notice of Lawsuit and Request for Waiver of Service and Verified Complaint and Jury Demand have not been served upon defendant yet. Therefore, plaintiff's amendment clearly falls within the time set forth in Rule 15(a)(1)(B).

Redline and non redline versions of Amended Verified Complaint and Jury Demand are attached to this motion. Vermont Local Rule 15(a).

 $WHEREFORE, plaintiff \, requests \, the \, Court \, grant \, her \, motion \, to \, amend \, her \, complaint.$

DATED: 8/3/12 . THERSIA J. KNAPIK PLAINTIFF

/s/Norman E. Watts
Norman E. Watts, Esq.
Attorney for Plaintiff